

**WESTERN<sup>®</sup>  
MULTIPLEX  
CORPORATION**

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300 Harbor Boulevard  
Belmont, California 94002  
Tel. (415) 592-8832  
Fax (415) 592-4249  
Telex via RCA 295114 WESMUX

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MAR 4 1994

FCC MAIL ROOM

March 3, 1994

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Mr. Secretary:

Please find enclosed an original and four copies of letters  
in support of our Petition for Rule Making, RM- 8435.

Companies in Support:

Central Power and Light Company,  
Cellular One, Walla Walla,  
Able Communications,  
Indiana Michigan Power Company,  
Radiofone,  
Youngstown Cellular Telephone,  
Valcom, Inc.,  
JEFA International.

Sincerely

John Woods  
President

No. of Copies rec'd 0+4  
List ABCDE PRB

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February 3, 1994

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20544

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MAR 4 1994

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In the Matter of

Amendment of Part 15 of the Rules )  
with regard to the operation of )  
spread spectrum transmitters )  
with directional antennas )

RM- 8435

To: The Commission

**COMMENTS OF CENTRAL POWER & LIGHT COMPANY'S (CPL) PETITION FOR  
RULE MAKING BY WESTERN MULTIPLEX**

CPL hereby submits the following comments to support the Petition for Rule Making by Western Multiplex to amend the second sentence of Section 15.247(b) of the Commission's Rules as follows:

**Proposed wording :** "If transmitting antennas of directional gain greater than 6 dBi are used with equipment operating in the frequency band 902-928 MHz, the power shall be reduced by the amount in dB that the directional gain of the antennae exceeds 6 dBi."

**Demonstrated Public Need**

CPL Company is a user of spread spectrum microwave radios manufactured by Western Multiplex under rule section 15.247 and the transition provisions of rule section 15.37.

CPL believes that there is **clearly** a widespread public need for these types of systems throughout the United States.

**In the Public Interest**

CPL believes that this Petition should be granted in the public interest.



A Member of the Central and South West System

Central Power and Light  
Corpus Christi, Texas

Public Service Company of Oklahoma  
Tulsa, Oklahoma

Southwestern Electric Power  
Shreveport, Louisiana

West Texas Utilities  
Arlington, Texas

### **No Known Case of Harmful Interference**

There are no cases of harmful interference in either the 2400-2483.5 MHz or 5725-5850 MHz bands known to CPL that have been caused by products manufactured by Western Multiplex.

### **Advantages of Using Directional Antennas**

CPL recommends that the FCC encourage the use of directional antennas where practicable, such as for outdoor fixed links because of their advantages in reducing interference.

Respectfully submitted,

Central Power & Light Company  
P.O.Box 2121  
Corpus Christi, TX 78403

By : Deval Shah

Deval Shah

Date : February 2, 1994

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

Amendment of Part 15 of the Rules)  
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with directional antennas )

RM- 8435

To: The Commission

**COMMENTS OF INDIANA MICHIGAN POWER COMPANY PETITION  
FOR RULE MAKING BY WESTERN MULTIPLEX**

Indiana Michigan Power Company hereby submits the following comments to support the Petition for Rule Making by Western Multiplex to amend the second sentence of Section 15.247(b) of the Commission's Rules as follows:

**Proposed wording:** "If transmitting antennas of directional gain greater than 6 dBi are used with equipment operating in the frequency band 902-928 MHz, the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi."

**Demonstrated Public Need**

Indiana Michigan Power Company is a user of spread spectrum microwave radios manufactured by Western Multiplex under Rule Section 15.247 and the transition provisions of Rule Section 15.37.

Indiana Michigan Power Company believes that there is **clearly** a widespread public need for these types of systems throughout the United States.

**In the Public Interest**

Indiana Michigan Power Company believes that this Petition should be granted in the public interest.

**No Known Case of Harmful Interference**

There are no cases of harmful interference in either the 2400-2483 MHz or 5725-5850 MHz bands known to Indiana Michigan Power Company that have been caused by products manufactured by Western Multiplex.

**Advantages of Using Directional Antennas**

Indiana Michigan Power Company recommends that the FCC encourage the use of directional antenna where practicable, such as for outdoor fixed link because of their advantages in reducing interference.

Respectfully submitted,

Indiana Michigan Power Company  
P. O. Box 60  
Ft. Wayne, IN 46801

By:

  
K. C. Campbell

Date:

1-18-94

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

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RM- 8435

To: The Commission

**COMMENTS OF ABLE COMMUNICATIONS ON PETITION FOR RULE  
MAKING BY WESTERN MULTIPLEX**

Able Communications hereby submits the following comments to support the Petition for Rule Making by Western Multiplex to amend the second sentence of Section 15.247(b) of the Commission's Rules as follows :

**Proposed wording :** "If transmitting antennas of directional gain greater than 6 dBi are used with equipment operating in the frequency band 902-928 MHz, the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi."

**Demonstrated Public Need**

Able Communications is a user of spread spectrum microwave radios manufactured by Western Multiplex under rule section 15.247 and the transition provisions of rule section 15.37.

Able Communications believes that there is **clearly** a widespread public need for these types of systems throughout the United States.

**In the Public Interest**

Able Communications believes that this Petition should be granted in the public interest.

### **No Known Case of Harmful Interference**

There are no cases of harmful interference in either the 2400-2483.5 MHz or 5725-5850 MHz bands known to Able Communications that have been caused by products manufactured by Western Multiplex.

### **Advantages of Using Directional Antennas**

Able Communications recommends that the FCC encourage the use of directional antennas where practicable, such as for outdoor fixed links because of their advantages in reducing interference.

Respectfully submitted,

Able Communications  
10502 Telephone Rd., Suite 331  
Houston, TX 77075

By: Bill Donelson

Bill Donelson

Date: JAN 11, 1993

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MAR 4 1994

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

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To: The Commission

**COMMENTS OF CELLULAR ONE, WALLA WALLA PETITION FOR RULE  
MAKING BY WESTERN MULTIPLEX**

Cellular One, Walla Walla hereby submits the following comments to support the Petition for Rule Making by Western Multiplex to amend the second sentence of Section 15.247(b) of the Commission's Rules as follows :

**Proposed wording :** "If transmitting antennas of directional gain greater than 6 dBi are used with equipment operating in the frequency band 902-928 MHz, the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi."

**Demonstrated Public Need**

Cellular One, Walla Walla is a user of spread spectrum microwave radios manufactured by Western Multiplex under rule section 15.247 and the transition provisions of rule section 15.37.

Cellular One, Walla Walla believes that there is **clearly** a widespread public need for these types of systems throughout the United States.

**In the Public Interest**

Cellular One, Walla Walla believes that this Petition should be granted in the public interest.



### **No Known Case of Harmful Interference**

There are no cases of harmful interference in either the 2400-2483.5 MHz or 5725-5850 MHz bands known to Cellular One, Walla Walla that have been caused by products manufactured by Western Multiplex.

### **Advantages of Using Directional Antennas**

Cellular One, Walla Walla recommends that the FCC encourage the use of directional antennas where practicable, such as for outdoor fixed links because of their advantages in reducing interference.

Respectfully submitted,

Cellular One, Walla Walla  
P.O. Box 754  
Walla Walla, WA 99362

By: Robert Greene

Robert Green

Date: 1-14-94

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 205  
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**MAR 4 1994**

In the Matter of

Amendment of Part 15 of the Rules )  
with regard to the operation of ) RM - 8435  
spread spectrum transmitters )  
with directional antennas )

To: The Commission

**WE THE UNDERSIGNED SUPPORT THE ABOVE PETITION FOR RULE MAKING  
BY WESTERN MULTIPLEX CORPORATION.**

We believe that the granting of the petition would be in the  
public interest for at least the reasons given in the petition.

We know of no case of harmful interference that has been caused  
by spread spectrum radios using directional antennas in either  
the 2400-2483.5 MHz or 5725-5850 MHz frequency bands.

Company RadioFone

Street 3131 E 16 Street RD

City McAllen State LA Zip 70002

Name Harold Freeman

Signature [Signature] Date Feb Mar 2, 94

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 20554

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In the Matter of

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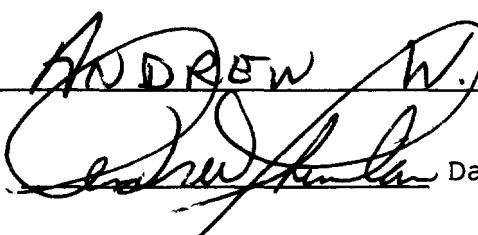
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the 2400-2483.5 MHz or 5725-5850 MHz frequency bands.

Company VALCOM, INC  
Street 4515 SOUTH HIGH SCHOOL RD  
City INDIANAPOLIS State IN Zip 46241  
Name ANDREW W. THIMLAR  
Signature  Date 3-2-94

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 20554

In the Matter of

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Company JEFA INTERNATIONAL

Street 1108 DOBIE DR.

City PLANO State TX Zip 75074

Name DENNIS F. KLINE

Signature Dennis F. Kline Date 3/2/84

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C., 20554

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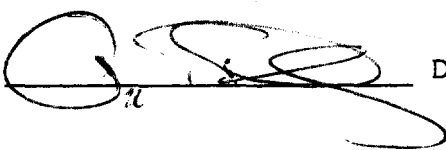
We know of no case of harmful interference that has been caused  
by spread spectrum radios using directional antennas in either  
the 2400-2483.5 MHz or 5725-5850 MHz frequency bands.

Company YOUNGSTOWN Cellular Telephone

Street 3910 South Ave.

City YOUNGSTOWN State OH Zip 44512

Name GREGORY T. Pukey

Signature  Date 3/2/94